



Town of Middleton
Memorial Hall
48 South Main Street
Middleton, Massachusetts
01949-2253
978-777-3617
www.middletonma.gov

September 17, 2025
Michael Busby, 40B Specialist
Mass Housing Finance Agency
One Beacon Street
Boston, Massachusetts 02108

Mr. Busby:

Thank you for the opportunity to provide comments on the application for Project Eligibility submitted by Ferncroft Apartments, LLC to develop a rental housing project under MGL Chapter 40B on Village Road in Middleton. The applicant is proposing to construct a five-story building and a six-story building for two hundred (200) total units of rental housing, along with parking and other amenities. Fifty (50) of the housing units are proposed to be affordable for households earning no more than 80% of AMI. The project is proposed to be located on a 12.6 acre site which is partially occupied by the eight-story Ferncroft Corporate Center in the Industrial Highway Zoning District.

While we are cognizant that c. 40B requires only preliminary plans, the challenges of this site require that considerably more detailed plans and review are needed for the Town to effectively evaluate and consider this project. We anticipate that, during any hearing on this matter, the Zoning Board of Appeals and Town departments will have the benefit of qualified peer review resources to conduct detailed analyses of technical studies submitted by the developer. At this preliminary stage, we have solicited input from Town departments and public feedback on the application and materials submitted for Project Eligibility. We have serious concerns about water supply, traffic, parking, and site layout, which are outlined in this letter. Without these concerns addressed, the Town cannot presently support the project, notwithstanding the obvious benefits of the housing that is proposed.

The Town of Middleton prioritizes the development of affordable housing and is actively working toward the diversification of housing options to support the needs of our population, including in particular older adults and young families. The Town is working to achieve the state c. 40B minimum threshold of 10% affordable units. While the proposed project may assist in meeting these goals, several concerns have been raised about this project that are addressed in the following commentary:

Traffic and Parking:

This project is located on Village Road on the site of the existing Ferncroft Corporate Center and adjacent to both the Water Park of New England and the DoubleTree Hilton North Shore Hotel. The site borders a single-family residential neighborhood to the west and several condominium developments and the Ferncroft County Club to the north. There is very limited pedestrian and bicycle access connecting this site to nearby destinations, and there is no nearby public transportation, requiring all new residents to have personal vehicular transportation. The increase in traffic due to this development should be studied extensively with consideration given to traffic calming measures and safety measures at key intersections. These include traffic



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calming measures on Village Road, safe and appropriately marked pedestrian crossing opportunities on Village Road, and comprehensive updates as needed to the nearby intersection at East Street/Locust Street. Additionally, if public access to the development via Locust Street is deemed necessary, the intersections at Village Road/Locust Street and Village Road/Ferncroft Road, which is under jurisdiction of Danvers, should also be studied to ensure the safety of residents.

Considering the lack of public transit in the area, the developer should carefully consider whether there is an adequate parking supply for the residential units and the existing office building. There is a historic zoning variance for parking requirements on the property which will need to be addressed before the project can be appropriately permitted.

Water Supply:

The water to this development will be supplied by the Town of Danvers, as governed by an intermunicipal agreement with the Town of Middleton along with a pump station privately owned and operated by Weston & Sampson. A Water Management Act Permit limits total withdrawals from the system. The developer must study and document the water demand and hydraulics of this project and determine if there is sufficient pressure and capacity to accommodate the development. There are known water supply issues in the area and increased use without system upgrades may affect fire suppression needs. The developer must also plan for compliance with the Town of Danvers and Town of Middleton requirements for water conservation and a Water Use Mitigation Program (WUMP). All of these efforts require evaluation without the benefit of c. 40B which cannot be utilized here for approvals or waivers relating to water infrastructure.

Wastewater and Stormwater Drainage:

The site is currently serviced by the South Essex Sewerage District (SESD). The developer should be aware that they will need to coordinate with SESD for both a sewer connection and an ongoing maintenance agreement outlining responsible parties for repairs, including those in the Town right of way. The Town of Middleton does not service or repair SESD lines; and, again, this issue is beyond the reach of c. 40B.

Stormwater management in Massachusetts is governed by sections of state Wetlands Regulations and Water Quality Regulations, as well as the DEP stormwater management guidelines. The developer must study and propose solutions to deal with stormwater from the development that prevents untreated flow off the site, controls the flow of stormwater to prevent erosion, and otherwise meets the rigorous standards imposed by the federal, state, and local government. Because of the steep grade on the site and the expected increase in impervious areas, on-site stormwater management collection systems should be considered to reduce runoff and to not overwhelm the Town's existing drainage system. Given the complexity of the site, a comprehensive stormwater management plan must be provided and be subject to rigorous review.



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Fire Safety and Access:

After reviewing the preliminary site plan, the Fire Chief has expressed concerns about the department's access to all areas of the building to facilitate effective firefighting and emergency medical response. The current layout of roadways and parking lots on the site appear to limit 360-degree access to the building and effective deployment of fire apparatus, including aerial reach for ladder operations. Anticipated EV charging stations, particularly within parking garages, present unique fire safety risks that must be mitigated. The Town encourages the developer to work with the Fire Chief to develop solutions to these concerns. Limitations on emergency access have particular resonance under c. 40B and resolving concerns with respect thereto must be a high priority.

Fire Prevention and Code Enforcement

A development of this size will require extensive planning, strict code enforcement, and ongoing inspections. With the Fire Department's current fire prevention staffing and configuration, effectively managing a project of this magnitude will present significant challenges. Sufficient peer review resources will be necessary to evaluate compliance.

Impact on Emergency Response and Call Volume

The addition of a large-scale residential development will inevitably increase emergency call volume. This added demand will place further strain on fire suppression and emergency medical services, which are already operating with limited staffing. Current personnel availability, particularly for off-duty coverage, makes it increasingly difficult to manage overlapping or consecutive incidents. Additionally, the increased call volume in this area will necessitate more frequent responses through the intersections of Routes 114 and 62 (Middleton Square), which may result in longer response times and increased travel hazards. Expanding development without corresponding enhancements to public safety resources will exacerbate these challenges. Appropriate mitigation must be discussed.

Neighborhood Impacts and Sustainability:

It is clear that the development of a large-scale rental apartment complex will have significant impacts on the character and quality of life for the surrounding neighborhoods. The preliminary design of the residential buildings is intentionally scaled to the area, and the Town encourages the developer to continue to make efforts to align the design, building materials, and amenities with the surrounding neighborhood and anticipated community needs. Care must be taken to avoid increasing light and noise pollution from the development and to mitigate impacts from vehicular light, noise, and exhaust as they enter and exit the property. Proper sound attenuation for air handlers, rooftop mechanical equipment and other operations must be planned to meet state noise regulations. Additional concerns have been raised relative to proposed shared outdoor rooftop spaces and the carrying of noise into surrounding neighborhoods. Measures should also be taken to reduce single-vehicle trips, including bicycle accommodations, car sharing services, and shuttle bus facilities. Considerations for the safety of school children who



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may reside in the building should be prioritized, including safe and well-marked walking routes to the nearest bus stops and future opportunities for an additional bus stop should the need arise. Finally, construction impacts related to the development of this difficult site must be considered. The applicant should be required to provide a full and complete construction management plan.

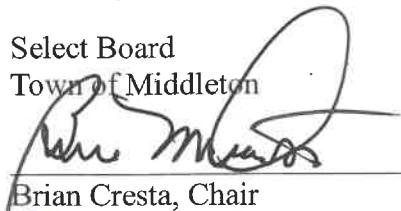
In summary, the Town is supportive of affordable housing that meets the needs of a diverse and changing resident population. However, while this project does offer much needed affordable housing, the project's size requires additional comprehensive planning and solutions to mitigate the impacts to the neighborhood, town, and region. While the Town recognizes some version of such a project could be viable, as proposed the project cannot be built by right even within the broader allowances afforded by c. 40B. In the event Mass Housing issues a Project Eligibility Letter for Site Approval, we strongly urge it to require the developer to study the issues raised in this letter, advance specific mitigation proposals, and provide the Town with resources necessary to conduct effective peer review.

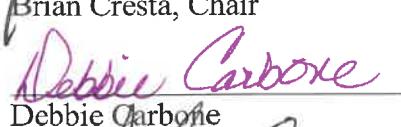
While developing comments to this application, the Select Board has solicited public input from relevant Town staff, board and committee members, and interested residents through a public forum.

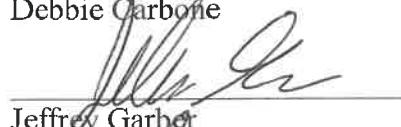
We appreciate the opportunity to submit these comments. Thank you for your consideration.

Sincerely,

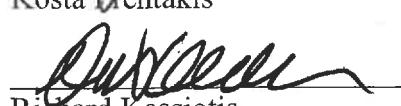
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Town of Middleton


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cc: Justin Sultzbach, Town Administrator
Jay Talerman, Town Counsel